

**FILED**  
**APR 27 2022**  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MILTON WILLIAMS,

Defendant.

) INDICTMENT

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**JUDGE FLEMING**

CASE NO. **4 : 22 CR 194**

Title 18, United States Code,  
Sections 201(b)(2)(C), 371,  
1791(a)(1), (b)(4), (d)(1)(F), and  
(d)(1)(G)

GENERAL ALLEGATIONS

**MAG. JUDGE PARKER**

1. The Bureau of Prisons ("BOP") was established as a bureau within the United States Department of Justice under the authority and direction of the Attorney General.
2. The Attorney General was authorized to delegate responsibility for the safekeeping of all persons charged with or convicted of offenses against the United States to the BOP.
3. The Federal Correctional Institution, Elkton ("FCI-Elkton") operated under the BOP for the safekeeping of persons convicted of offenses against the United States. Defendant MILTON WILLIAMS was employed by FCI-Elkton as a Correctional Officer.
4. "Mobile Payment Application" was a mobile payment service that allowed individuals to send and receive sums of money electronically.

COUNT 1

(Conspiracy to Commit Providing Contraband in Prison, 18 U.S.C. §§ 371 and 1791(a)(1), (b)(4), (d)(1)(F), and (d)(1)(G))

The Grand Jury charges:

5. From on or about March 15, 2020 to on or about January 21, 2021, Defendant MILTON WILLIAMS, and coconspirators known but not charged and coconspirators unknown to the Grand Jury, knowingly and willfully conspired and agreed together and with each other, to knowingly provide and attempt to provide prohibited objects to a prison inmate, to wit: cellular telephones and tobacco, in violation of Title 18, United States Code, Sections 371 and 1791(a)(1), (b)(4), (d)(1)(F), and (d)(1)(G).

OBJECT OF THE CONSPIRACY

6. The object of the conspiracy was to enrich Defendant and his coconspirators by providing prohibited objects to prison inmates, to wit: cellular telephones and tobacco in exchange for cash payments through electronic payments via Mobile Payment Application.

MANNER AND MEANS OF THE CONSPIRACY

7. The manner and means by which the conspirators sought to accomplish the conspiracy included, among others, the following:

- a. Defendant and his coconspirators would smuggle contraband into FCI-Elkton.
- b. Defendant and his coconspirators would sell the contraband to prison inmates.
- c. Defendant and his coconspirators would receive cash payment in exchange for the contraband through electronic payments via Mobile Payment Application.

OVERT ACTS

8. In furtherance of the conspiracy, and to effect the objects and conceal the existence thereof, Defendant and coconspirators known but not charged and coconspirators

unknown to the Grand Jury performed overt acts in the Northern District of Ohio and elsewhere, including, but not limited to, the following:

a. From on or about March 15, 2020 to on or about January 21, 2021, Defendant and coconspirators known but not charged and coconspirators unknown to the Grand Jury smuggled in contraband, specifically cellular phones and tobacco to FCI-Elkton and sold it to prison inmates in exchange for money through electronic payments via Mobile Payment Application.

All in violation of Title 18, United States Code, Sections 371 and 1791(a)(1), (b)(4), (d)(1)(F), and (d)(1)(G).

COUNT 2  
(Accepting Bribes, 18 U.S.C. § 201(b)(2)(C))

The Grand Jury further charges:

9. From on or about March 15, 2020 to on or about January 21, 2021, Defendant MILTON WILLIAMS, a public official, directly and indirectly did corruptly demand, seek, receive, accept, and agree to receive and accept something of value personally, in return for being induced to do an act and omit to do an act in violation of his official duties, that is: accepting electronic payments via Mobile Payment Application in exchange for smuggling contraband into FCI-Elkton (as charged in Counts 1, 3 and 4 herein), in violation of Title 18, United States Code, Section 201(b)(2)(C).

COUNT 3  
(Providing Cellular Telephones to an Inmate, 18 U.S.C. §§ 1791(a)(1), (b)(4), and (d)(1)(F))

The Grand Jury further charges:

10. From on or about March 15, 2020 to on or about January 21, 2021, in the Northern District of Ohio, Eastern Division, Defendant MILTON WILLIAMS, a correctional officer at FCI-Elkton, contrary to 28 C.F.R. §§ 6.1, 553.12, and 500.1(h), knowingly provided

and attempted to provide a prohibited object to a prison inmate, to wit: cellular telephones, in violation of Title 18, United States Code, Sections 1791(a)(1), (b)(4), and (d)(1)(F).

COUNT 4

(Providing Tobacco to an Inmate, 18 U.S.C. §§ 1791(a)(1), (b)(4), and (d)(1)(G))

The Grand Jury further charges:

11. From on or about March 15, 2020 to on or about January 21, 2021, in the Northern District of Ohio, Eastern Division, Defendant MILTON WILLIAMS, a correctional officer at FCI-Elkton, contrary to 28 C.F.R. §§ 6.1, 553.12, and 500.1(h), knowingly provided and attempted to provide a prohibited object to a prison inmate, to wit: tobacco, in violation of Title 18, United States Code, Sections 1791(a)(1), (b)(4), and (d)(1)(G).

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.